

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

----- x

ROSS UNIVERSITY SCHOOL OF MEDICINE, LTD.,	:	ECF Case
	:	09 Civ. 1410 (KAM) (RLM)
Plaintiff,	:	
	:	<b>AFFIDAVIT IN SUPPORT OF</b>
	:	<b>MOTION TO ADMIT</b>
– against –	:	<b>GEORGE J. TZANETOPOULOS</b>
	:	<b>AND DAVID K. COLE, III AS</b>
	:	<b>PRO HAC VICE CO-COUNSEL</b>
BROOKLYN-QUEENS HEALTH CARE, INC.,	:	
	:	
Defendant.	x	

-----

STATE OF NEW YORK     )  
                                      : ss.:  
COUNTY OF NEW YORK )

ANDREW J. CALICA, being duly sworn, deposes and says:

1. I am a member of the Bar of this Court and am associated with Mayer Brown LLP, attorneys for plaintiff Ross University School of Medicine, Ltd. ("Ross University"). I make this Affidavit in support of Ross University's motion for Orders, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, permitting George J. Tzanetopoulos and David K. Cole, III, of the Illinois Bar, to appear pro hac vice in this action as attorneys for Ross University.

2. Mr. Tzanetopoulos is a partner in the Chicago office of Mayer Brown LLP. As appears from his accompanying Affidavit (Exhibit 1 hereto), he is a member in

good standing of all federal and state bars to which he has been admitted and no disciplinary proceedings are pending against him in any jurisdiction.

3. Mr. Tzanetopoulos has an excellent reputation as an attorney, and I have every confidence that if admitted he will acquit himself in a most exemplary fashion before the Bar of this Court.

4. Mr. Cole is an associate in the Chicago office of Mayer Brown LLP. As appears from his accompanying Affidavit (Exhibit 2 hereto), he is a member in good standing of all federal and state bars to which he has been admitted and no disciplinary proceedings are pending against him in any jurisdiction.

5. Mr. Cole has an excellent reputation as an attorney, and I have every confidence that if admitted he will acquit himself in a most exemplary fashion before the Bar of this Court.

6. Because this motion does not present any significant factual or legal issues, Ross University respectfully requests that the Court dispense with the Local Civ. R. 7.1 requirement of a memorandum of law.

WHEREFORE, plaintiff Ross University respectfully prays for the entry of Orders, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, permitting George J. Tzanetopoulos and David K. Cole, III to appear as some of its attorneys in this matter.

  
\_\_\_\_\_  
ANDREW J. CALICA

Sworn to before me this  
22th day of July, 2009.

  
\_\_\_\_\_  
Notary Public

MARY THERESA BARBETTA  
Notary Public, State of New York  
No. 01BA6015626  
Qualified in Queens County  
Commission Expires Nov. 2, 20 10

# EXHIBIT 1

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

----- x

ROSS UNIVERSITY SCHOOL OF MEDICINE, LTD.,	:	ECF Case
	:	09 Civ. 1410 (KAM) (RLM)
Plaintiff,	:	
	:	<b>AFFIDAVIT OF</b>
	:	<b>GEORGE J. TZANETOPOULOS</b>
– against –	:	
	:	
BROOKLYN-QUEENS HEALTH CARE, INC.,	:	
	:	
Defendant.	x	

-----

STATE OF ILLINOIS    )  
                                  : ss.:  
COUNTY OF COOK    )

GEORGE J. TZANETOPOULOS, being duly sworn, deposes and says:

1. I am a member of Mayer Brown LLP, attorneys for Plaintiff Ross University School of Medicine, Inc. ("Ross University"). I am resident in the firm's Chicago office. I make this Affidavit in connection with Ross University's motion for an order authorizing me to appear as pro hac vice co-counsel with its other Mayer Brown attorneys.

2. I was admitted to the Illinois Bar in 1985. A current good standing certificate is annexed as Exhibit A hereto.

3. I am also a member in good standing of the Bars of the United States Courts of Appeal for the Seventh Circuit, of the United States District Courts for the Northern District of Illinois, the District of Colorado and the Eastern District of Michigan.

4. I have never been the subject of attorney disciplinary proceedings in any jurisdiction.

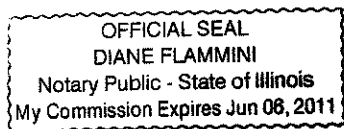


GEORGE J. TZANETOPOULOS

Sworn to before me this  
17th day of July, 2009.



Notary Public



# EXHIBIT A

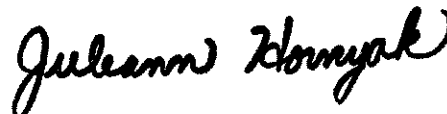
## **Certificate of Admission To the Bar of Illinois**

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

George James Tzanetopoulos

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 7, 1985 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto  
placed my hand and affixed the seal  
of said Supreme Court, at Springfield,  
in said State, this Tuesday, July 14, 2009.

A handwritten signature in black ink, reading "Juleann Hornyak". The signature is written in a cursive, flowing style.

Clerk



# EXHIBIT 2

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

----- x

ROSS UNIVERSITY SCHOOL OF MEDICINE, LTD.,	:	ECF Case
	:	09 Civ. 1410 (KAM) (RLM)
Plaintiff,	:	<b>AFFIDAVIT OF</b>
	:	<b>DAVID K. COLE, III</b>
– against –	:	
	:	
BROOKLYN-QUEENS HEALTH CARE, INC.,	:	
	:	
Defendant.	x	

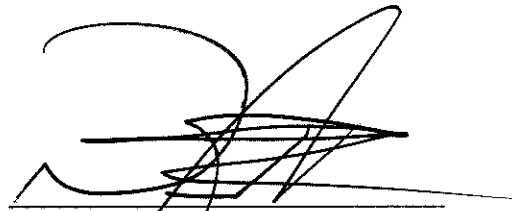
-----

STATE OF ILLINOIS    )  
                                      : ss.:  
COUNTY OF COOK    )

GEORGE J. TZANETOPOULOS, being duly sworn, deposes and says:

1. I am an associate at Mayer Brown LLP, attorneys for Plaintiff Ross University School of Medicine, Inc. (“Ross University”). I am resident in the firm’s Chicago office. I make this Affidavit in connection with Ross University’s motion for an order authorizing me to appear as pro hac vice co-counsel with its other Mayer Brown attorneys.
2. I was admitted to the Illinois Bar in 2002. A current good standing certificate is annexed as Exhibit A hereto.
3. I am also a member in good standing of the Bar of the United States District Court for the Northern District of Illinois.

4. I have never been the subject of attorney disciplinary proceedings in any jurisdiction.



DAVID K. COLE, III

Sworn to before me this  
17<sup>th</sup> day of July, 2009.



Notary Public



# EXHIBIT A

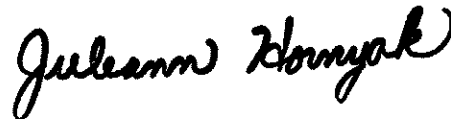
## **Certificate of Admission To the Bar of Illinois**

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

David K. Cole, III

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on December 14, 2002 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto  
placed my hand and affixed the seal  
of said Supreme Court, at Springfield,  
in said State, this Tuesday, July 14, 2009.

A handwritten signature in black ink, reading "Juleann Hornyak". The signature is written in a cursive, flowing style.

Clerk